

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>SECOND AMENDMENT ARMS, et al.,</b>	)	
	)	
Plaintiffs,	)	<b>No. 10-CV-4257</b>
	)	
v.	)	<b>Judge Robert M. Dow, Jr.</b>
	)	
<b>CITY OF CHICAGO, et al.,</b>	)	<b>Magistrate Judge Sheila M. Finnegan</b>
	)	
Defendants.	)	

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
TO FILE THEIR REPLY IN SUPPORT OF THEIR MOTION TO DISMISS**

Defendants City of Chicago (the “City”), Mayor Rahm Emanuel, Superintendent of Police Garry McCarthy, and City Clerk Susana Mendoza (collectively, “Defendants”), by their counsel, Stephen R. Patton, Corporation Counsel of the City of Chicago, hereby respectfully move this Court for a two week extension, to and including April 6, 2015, to file Defendants’ reply brief in support of their motion to dismiss Counts I-VI of Plaintiffs’ fourth amended complaint. In support of this motion, Defendants state as follows:

1. Plaintiffs filed their Fourth Amended Complaint (“Complaint”) on October 22, 2014. Dkt. No. 146. In its eight counts, Plaintiffs challenge various provisions of the City’s firearms regulations under the First, Second, and Fourteenth Amendments, including a challenge to the City’s recently enacted ordinance regulating the location and operation of firearm retail establishments in Chicago. *Id.*
2. The Court granted Defendants’ requests for additional time to answer or otherwise respond to the Complaint. Dkt. Nos. 149, 154.
3. On January 2, 2015, Defendants filed a motion to dismiss Counts I through VI of the Complaint for failure to state a claim. Dkt. No. 162.

4. Plaintiffs subsequently requested, and the Court granted, extensions of time for Plaintiffs to respond to Defendants' motion to dismiss. Dkt. Nos. 165, 168.

5. According to the Court's minute order of February 20, 2015, Plaintiffs had until March 2, 2015 to file their response and Defendants until March 23, 2015 to file their reply. Dkt. No. 168.

6. Plaintiffs filed their response on March 3, 2015. Dkt. No. 169.

7. Defendants respectfully request an extension of two weeks, to and including April 6, 2015, to file their reply brief in support of their motion to dismiss Plaintiffs' Complaint. Since receiving Plaintiffs' response brief, Defendants' counsel have had to devote substantial attention to other matters, including preparing a potential oral argument in *Friends of the Parks v. Chicago Park District*, No. 14-cv-9096 (N.D. Illinois); briefing of motions to dismiss in *Right Field Properties, LLC, et al. v. Commission on Chicago Landmarks, et al.*, No. 14-cv-7100 (N.D. Illinois), *US Awami League v. City of Chicago*, No. 15-cv-1753 (N.D. Illinois), *Park Pet Shop, Inc. v. City of Chicago*, No. 15-cv-1450 (N.D. Illinois); *Peoples Stadium Parking Management, LLC v. City of Chicago*, No. 14 CH 20290 (Circuit Court of Cook County), and *DeJuan B. Thornton-Bey v. City of Chicago, et al.*, No. 14 CH 14848 (Circuit Court of Cook County); preparing a motion for summary judgment on the pleadings in *Hanna v. City of Chicago*, No. 06 CH 19422 (Circuit Court of Cook County); conducting a deposition in *Jitney One Network Transportation v. City of Chicago*, No. 13 L 4973 (Circuit Court of Cook County); and responding to a discovery motion and preparing expert testimony in *LMP Services, Inc. v. City of Chicago*, No. 12 CH 41235 (Circuit Court of Cook County).

8. Defendants' counsel spoke with Plaintiffs' counsel regarding this motion, and Plaintiffs have no objection to the granting of a two week extension, to and including April 6,

2015, for Defendants to file their reply brief.

**WHEREFORE**, for the foregoing reasons, Defendants respectfully request that the Court grant Defendants an extension of two weeks, to and including April 6, 2015, to file their reply brief in support of Defendants' motion to dismiss Counts I-VI of the Complaint and grant Defendants such further relief as this Court deems just and appropriate.

Date: March 19, 2015

Respectfully submitted,

STEPHEN R. PATTON,  
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